

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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Counsel for Debtors

In re Walter & Novlett Taylor,

Debtor(s).

Case No. 19-11250(RG)

Hearing Date: April 17, 2019 @ 10:00 a.m.

Judge: Rosemary Gambardella, U.S.B.J.

NOTICE OF MOTION FOR LOSS MITIGATION

To: BSI Financial Services
c/o Friedman Vartolo, LLP
85 Broad Street Suite 501
New York, New York 10004

Marie-Ann Greenberg, Ch. 13 Trustee
30 Two Bridges Road, Suite 330
Fairfield, NJ 07004

PLEASE TAKE NOTICE that on the 17th day of April 2019, at 10:00 a.m. or as soon thereafter as counsel may be heard, the undersigned attorney for debtor shall appear before The Honorable Rosemary Gambardella, United States Bankruptcy Court, M.L.King, Jr. Federal Courthouse, 50 Walnut Street, Newark, New Jersey and apply for an Order for Loss Mitigation.

In support of this motion the undersigned shall rely upon the Certification of Counsel in support of the motion which is annexed hereto.

PLEASE TAKE FURTHER NOTICE that Movant requests oral argument only if opposed.

PLEASE TAKE FURTHER NOTICE that unless timely responsive papers are filed in accordance with the appropriate rules, this Motion shall be deemed uncontested.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the court to grant the relief sought in motion, or if you want the court to consider your views on the motion, then on or before seven (7) days prior to the hearing, you or your attorney must file opposition with the court explaining your position at: Clerk, United States Bankruptcy Court, 50 Walnut Street, Newark, New Jersey 07102.

If you mail your response to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

You must also mail a copy to: Law Office of Michael P. Otto, LLC, 1030 Stelton Road, Suite 102, Piscataway, New Jersey 08854

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

**LAW OFFICE OF
MICHAEL P. OTTO, LLC**
Counsel for Debtor

Dated: March 18, 2019

By: /S/ Michael P. Otto
Michael P. Otto, Esq.

STATEMENT AS TO WHY NO BRIEF IS NECESSARY

PLEASE TAKE FURTHER NOTICE that the facts the debtor relies upon, as set forth on the accompanying certification, and the basis to grant the motion, do not present complicated questions of fact or unique questions of law, and it is hereby submitted that no brief is necessary for the Court's consideration of the within motion.

**LAW OFFICE OF
MICHAEL P. OTTO, LLC**
Counsel for Debtor

Dated: March 18, 2019

By: /S/ Michael P. Otto
Michael P. Otto, Esq.